

MILMAN LABUDA LAW GROUP
3000 MARCUS AVENUE
SUITE 3W8
LAKE SUCCESS, NY 11042-1073

TELEPHONE (516) 328-8899
FACSIMILE (516) 328-0082

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 12/3/2021

December 2, 2021

VIA ECF

United States District Court
Southern District of New York
Attn: Hon. Victor Marrero, U.S.D.J.
500 Pearl Street, Courtroom 15B
New York, NY 10007-1312

Re: Rosenfield & Co., PLLC v. Trachtenberg, Rodes & Friedberg LLP, et al.
Case No.: 1:21-cv-3858 (VM) (KHP)

Dear Judge Marrero:

This firm represents all of the Defendants in the above-referenced case with the exception of Trachtenberg, Rodes & Friedberg LLP (hereinafter the "Star Defendants"). The Star Defendants write to respectfully request an extension of time – until December 15, 2021 – to respond to Third Party Defendant Barry Friedberg, Third Party Defendant Leonard Rodes, and Defendant Trachtenberg Rodes & Friedberg LLP's letter dated November 17, 2021 identifying purported deficiencies in the Star Defendants' Answer with Counterclaims, Cross-Claims, and Third-Party Complaint (hereinafter referred to as the "TRF Defendants' Letter").

In compliance with your Honor's Individual Practices, the Star Defendants represent that: (i) there have been no previous requests for an extension of time to respond to TRF Defendants' Letter; (ii) TRF Defendants consent to the requested extension; and (iii) they are unaware of any scheduled dates that would be affected by the requested extension. The Star Defendants thank this honorable Court for its time and attention to this case.

Dated: Lake Success, New York
December 2, 2021

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/

Jamie S. Felsen, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042-1073
(516) 328-8899 (office)
(516) 328-0082 (facsimile)

via ECF (all parties of record).

Request GRANTED.

The Star Defendants shall have until December 15, 2021 to respond to the TRF Defendants' Letter.

SO ORDERED.

12/3/2021

DATE


VICTOR MARRERO, U.S.D.J.